Clean Harbors Environmental Services
761 Middle Street
Bristol, CT 06010
www.cleanharbors.com

February 20, 2014

U.S. Environmental Protection Agency
ATTN: Robert G. Heiss, Mail Code: 2254A
1200 Pennsylvania Avenue NW
Washington, DC 20460-0001

SUBJECT: **2013 Annual Export Report**
Clean Harbors of Connecticut, Inc., Bristol, CT

Mr. Heiss:
In accordance with 40 CFR 262.56, Annual reports for Exports of Hazardous Waste, please find enclosed the Annual Export Report for Clean Harbors of Connecticut (CHCI). The report details exports of hazardous waste made during the calendar year 2013.

If you have any questions regarding this submission please do not hesitate to contact me.

EXPORTER CERTIFICATION
I certify under penalty of lay that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Sincerely,
CLEAN HARBORS OF CONNECTICUT, INC.

David P. Cabral, P.E., BCEE
Compliance Manager
Mobile (513) 568-6357
Email: cabral.david@cleanharbors.com

Exporter Information

Exporter Name:	Clean Harbors of Connecticut Inc
Exporter EPA Identification Number:	CTD000604488
Exporter Mailing Street Address:	761 Middle Street
Exporter Mailing City:	Bristol
Exporter Mailing State:	Connecticut
Exporter Mailing Zip Code:	06010-7442
Exporter Mailing Country:	USA
Exporter Site Street Address:	51 Broderick Road
Exporter Site City:	Bristol
Exporter Site State:	Connecticut
Exporter Site Zip Code:	06010
Exporter Site Country:	USA

Calendar Year Covered by Report:	**2013**

Exporter Certification

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Exporter Printed Name:	David P. Cabral, P.E., BCEE
Exporter Signature:	
Date of Signature:	02-20-2014

As required in 40 CFR 262.56(a)(5) and 40 CFR 262.87(a)(5), Except for hazardous waste produced by exporters of greater than 100 kg but less than 1000 kg in a calendar month, unless provided pursuant to §262.41 [biennial report], when submitting in even numbered years:

(i) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated:	See Attached

(ii) A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for years prior to 1984:	Information regarding the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years is not available.

Receiving Facility Name	Receiving Facility Street Address	Receiving Facility City	Receiving Facility State or Province	Receiving Facility Zip Code	Receiving Country	Hazardous Waste Description	Applicable RCRA Hazardous Waste Code(s)	Applicable OECD Waste Codes [if submitting report under 40 CFR 262.87(a)]	DOT Hazard Class	Total Quantity Shipped During Reporting Year	Units for Total Quantity Shipped	Total Number of Shipments During Reporting Year	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)	Transporter Name	Transporter EPA ID Number (required if transporter carried hazardous waste with RCRA manifest in US)
Clean Harbors Canada Inc	4090 Telfer Road RR#1	Corunna	ON	N0N 1G0	CA	Carbon with trichloroethene	D040	NA	9	80	T	5	Page E T C Incorporated	NYD986969947	Clean Harbors Environmental Services Inc	MAD039322250	US Bulk Transport Inc	PAD987347515
Clean Harbors Canada Inc	4090 Telfer Road RR#1	Corunna	ON	N0N 1G0	CA	F006, F019 & F039 Filtercake	F006,F019,F039	NA	9	70	T	4	Clean Harbors Environmental Services Inc	MAD039322250				
Clean Harbors Canada Inc	4090 Telfer Road RR#1	Corunna	ON	N0N 1G0	CA	MACRO DEBRIS	D006,D008	NA	9	16,144	K	1	Clean Harbors Environmental Services Inc	MAD039322250				
Clean Harbors Canada Inc	4090 Telfer Road RR#1	Corunna	ON	N0N 1G0	CA	SOLID NEUTRAL DEBRIS W/METALS D004-11, F006-12, F019 DEBRISM	D006,D008	NA	9	47	T	4	Clean Harbors Environmental Services Inc	MAD039322250				

Waste Minimization Plan

Clean Harbors of Connecticut, Inc.

51 Broderick Road

Bristol, CT 06010

Clean Harbors of Connecticut, Inc. (CHCI) is a hazardous waste treatment storage and disposal facility Licensed under 22a-454-CGS of the Connecticut hazardous waste regulations (Part B Permit DEP/HWM-017-002). Pursuant to section 3005(h) of the Hazardous and Solid Waste Amendments of 1984 (HSW A), CHCT has developed and maintains this Waste Minimization Plan.

Waste minimization is defined by the U.S. EPA as the reduction, to the extent feasible, of hazardous waste that is generated or subsequently treated, stored or disposed, and includes both source reduction and recycling. Source reduction is defined as the reduction or elimination of waste generation at the source, usually within a process. Recycling refers to 1) the use or re-use of a waste as an effective substitute for a commercial product, or an ingredient or feedstock in an industrial process, and 2) reclamation, which is defined as the recovery or regeneration of a useable product from the processing of hazardous waste.

In its Interim Final guidance of the Elements of a Waste Minimization Program published in teh Federal Register on May 28,1993 (FR vol. 58, No. 102, Page 31114), EPA outlined six basic elements it should be incorporated into a successful waste minimization program.

The six elements EPA has proposed include: 1) Top management support; 2) Characterization of waste generation and waste management costs; 3) periodic waste minimization assessments; 4) appropriate cost allocation; 5) encouragement of technology transfer; 6) program implementation and evaluation.

CHCI is dedicated to the reduction and elimination of waste wherever economically practicable. CHCI adopts and implements this Waste Minimization Plan, which has been developed pursuant to the EPA's Interim final guidance.

David P. Cabral, P.E., BCEE
Compliance Manager

12-18-2013
Date

WASTE MINIMIZATION PLAN

December 18, 2013

CLEAN HARBORS OF CONNECTICUT, INC.

BRISTOL, CT

Characterization of Waste Generation and Waste Management Costs

CHCI has identified the following operational areas of the facility as actual or potential sources of on-site waste generation activity.

Laboratory Operations

CHCI operates an analytical laboratory used to conduct pre-qualification and conformance testing of candidate waste streams pursuant to the facility's waste analysis plan. The laboratory generates spent solvents, acids, alkalis and other analytical residuals, in addition to accepting generator status of obsolete samples.

On Site Waste Processing Activities

CHCI accepts wastes from off-site generators for treatment, storage and consolidation prior to transfer to another properly licensed facility. Actual treatment activities conducted at CHCI include chemical reduction, precipitation and other treatment of aqueous, inorganic waste streams, and stabilization of inorganic metal bearing wastes (e.g., soil and sludges contaminated with lead).

The quantity of treatment chemicals used to process a particular waste stream (e.g., for wastewater treatment or stabilization), as well as the specific method used ("recipe") dictates the overall amount of waste, which is generated from treatment activities. Candidate waste streams are first subject to a bench scale treatability evaluation to determine the correct treatment "recipe" in order to determine the most practical and cost effective method which will maximize treatment effectiveness while minimizing the amount of treatment residuals generated.

The use of waste materials in inventory for their potential treatment capabilities (ie., wastes as "reagents") is strongly promoted - this practice reduces the reliance upon virgin chemical reagents, and decreases the amount of treatment residuals otherwise generated by the need for two distinct treatment batches.

Upon treatment of containerized wastes, all containers are emptied to the most practical degree. Those that are RCRA-empty but contain residuals are disposed of as non-hazardous waste. Those that are clean and reclaimable are segregated and collected for container recycling by an appropriate offsite facility. Those that are clean but may not be reclaimable are crushed and consolidated in a scrap metal bulk container, from which the metal is recovered and reused by another offsite facility.

Releases:

The potential for spills, leaks, or other releases exists as a result of waste management activities. Spills or leaks generally require that additional materials (e.g. absorbents) be added to the released material resulting in an increase in the volume of waste generated. CHCI has a comprehensive facility inspection plan as part of its RCRA facility license. Daily, weekly, monthly, and annual inspections of containers, tanks, process lines, containment dikes, safety equipment and operating procedures ensure that potential problems are proactively identified and corrected. Releases are evaluated to determine why the event occurred, and what corrective actions should be implemented to ensure that a similar release would not reoccur.

Truck-To-Truck Transfers:

CHCI has provisions to conduct truck-to-truck transfer of hazardous waste. This ability allows the reduction of waste, which is actually received at the facility. Certain types of waste which may have been historically shipped to CHCI only to be reshipped to an ultimate disposal facility, may now be shipped directly to that ultimate disposal facility, and not received at CHCI; instead, the containers of waste will be delivered to the facility and transferred among appropriate vehicles without being received and processed (sampled, analyzed). Because CHCI will not take generator status of these wastes, activities such as opening and sampling of containers, analytical conformance testing, and physical transfer of waste through the facility will no longer be conducted. Reduction of these activities will in turn effect a direct reduction of on-site waste generation.

Dismantling:

CHCI no longer provides scrap and surplus equipment dismantling.

Waste Management Cost Accounting System:

CHCI does not have a formal waste management cost accounting system. CHCI management understands the costs (real and potential) associated with the storage, treatment, disposal and transportation of waste; employee exposure and health care; liability insurance; and potential RCRA corrective action costs. CHCI has a comprehensive training program whereby those individuals responsible for analytical operations, waste treatment activities, and waste handling and storage activities are properly trained in the standard operating procedures required to ensure that waste is managed in a manner that will minimize the generation of additional waste residuals.

Cost Allocation System

Because of the nature of operations at CHCI, a formal cost allocation system is not contemplated at this time. Comprehensive training and inspection plans are currently in place to ensure that releases are minimized. The waste treatment activities (wastewater treatment, and waste stabilization) are continually monitored to ensure that the use of virgin chemicals used in the treatment process are minimized, and replaced by use of appropriate wastes, thereby decreasing treatment costs and residuals.

If future assessments indicate that one is warranted, then a formal cost allocation system will be developed.

Encouragement of Technology Transfer

CHCI will share any waste minimization successes with other Clean Harbors, Inc. subsidiaries. For example, the Clean Harbors Compliance Department exchanges information on a monthly basis via a teleconference call. Compliance staff, as well as Operations, Laboratory, Maintenance and other personnel, exchange ideas using e-mail, as well.

CHCI has established the position of Waste Minimization Coordinator. This individual shall be responsible for overseeing waste minimization activities at CHCI. This will include ensuring that waste minimization is incorporated into the training program as appropriate, developing a team of facility personnel and coordinating periodic waste minimization meetings, and ensuring that periodic assessments of the program are conducted. Following each assessment, the plan will be modified if warranted. The waste minimization team will be assembled from various operational areas of the facility, and will be directed by the Compliance Manager (the Waste Minimization Coordinator) or his/her designee.

Program Implementation and Evaluation

This waste minimization plan will be reviewed annually, and amended as necessary.

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MAILED FROM

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